

1 Ramon Rossi Lopez (admitted *pro hac vice*)
(CA Bar No. 86361)
2 LOPEZ McHUGH LLP
100 Bayview Circle, Suite 5600
3 Newport Beach, California 92660
rlopez@lopezmchugh.com

4 Mark S. O'Connor (011029)
5 GALLAGHER & KENNEDY, P.A.
2575 East Camelback Road
6 Phoenix, Arizona 85016-9225
Telephone: (602) 530-8000
7 mark.oconnor@gknet.com

8 *Attorneys for Plaintiffs*

9 James R. Condo (#005867)
Amanda C. Sheridan (#027360)
10 SNELL & WILMER L.L.P.
One Arizona Center
11 400 E. Van Buren, Suite 1900
Phoenix, Arizona 85004-2202
12 Telephone: 602.382.6000
Facsimile: 602.382.6070
13 jcondo@swlaw.com
asheridan@swlaw.com

14 Richard B. North, Jr. (admitted *pro hac vice*)
Georgia Bar No. 545599
15 Matthew B. Lerner (admitted *pro hac vice*)
Georgia Bar No. 446986
16 NELSON MULLINS RILEY &
SCARBOROUGH LLP
17 201 17th Street, NW / Suite 1700
Atlanta, GA 30363
18 Telephone: (404) 322-6000
Telephone: (602) 382-6000
19 richard.north@nelsonmullins.com
matthew.lerner@nelsonmullins.com

20 *Attorneys for Defendants C. R. Bard, Inc. and*
21 *Bard Peripheral Vascular, Inc.*

22 UNITED STATES DISTRICT COURT

23 DISTRICT OF ARIZONA

24 In Re Bard IVC Filters Products Liability
25 Litigation

No. MD-15-02641-PHX-DGC

26 **PARTIES' JOINT SUBMISSION OF**
DISCOVERY PROTOCOL FOR
27 **BELLWETHER GROUP 1**
28

In accordance with the Parties' Joint Status Report for the May 3, 2017 Case Management Conference ("Joint Report"), the Parties have met and conferred regarding discovery protocols for Bellwether Group 1. The parties largely agree on the contents of the proposed case management order for the discovery protocols but have some discrete disagreements. As set forth in the Joint Report, the parties have submitted competing forms of the proposed protocol. The Parties have indicated the differences in their respective protocols by the use of underlining. Plaintiffs' proposed form of case management order is attached as Exhibit A; Defendants' proposed form of case management order is attached as Exhibit B.

RESPECTFULLY SUBMITTED this 3rd day of May, 2017

GALLAGHER & KENNEDY, P.A.

SNELL & WILMER L.L.P.

By: s/ Paul L. Stoller

By: s/ Richard B. North

Mark S. O'Connor

James R. Condo

Paul L. Stoller

Amanda C. Sheridan

2575 East Camelback Road

One Arizona Center

Phoenix, Arizona 85016-9225

400 E. Van Buren, Suite 1900

Phoenix, Arizona 85004-2202

Ramon Rossi Lopez

(admitted *pro hac vice*)

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LOPEZ McHUGH LLP

100 Bayview Circle, Suite 5600

Newport Beach, California 92660

Attorneys for Plaintiffs

Richard B. North, Jr. (admitted *pro hac vice*)

Georgia Bar No. 545599

Matthew B. Lerner (admitted *pro hac vice*)

Georgia Bar No. 446986

Nelson Mullins Riley & Scarborough LLP

201 17th Street, NW / Suite 1700

Atlanta, GA 30363

Attorneys for C. R. Bard, Inc. and Bard

Peripheral Vascular, Inc.

Certificate of Service

I hereby certify that on this 3rd day of May, 2017, I electronically transmitted the attached document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic Filing.

/s/Deborah Yanazzo

Deborah Yanazzo